

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC

Plaintiff,

v.

ALAN BRAM GOLDMAN

Defendants.

Civil No. 3:20-cv-1747(PAD)

Breach Of Contract; Specific
Performance Of Contract;
Reimbursement Of Funds, Costs
And Expenses

**NOTICE OF APPEARANCE AND REQUEST FOR EXTENSION OF TIME
TO FILE ANSWER TO COUNTERCLAIM**

To the Honorable Court:

Come Now, Mr. John Michael Grzan and his wife, Dr. Tamrata Khimani (jointly referred to as “Grzan-Khimani”), by and through the undersigned attorney, respectfully states and prays:

1. The undersigned attorney has been retained by the Grzan-Khimani to represent them in the instant case.

2. The undersigned attorney is duly admitted to practice before this Honorable Court and its address and phone numbers are the following:

The Law Offices of Héctor Eduardo Pedrosa-Luna
Attorney for Mr. John Michael Grzan and Dr. Tamrata Khimani
P.O. Box 9023963
San Juan, PR 00902-3963
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3. Furthermore, the Grzan-Khimani hereby respectfully request from this Honorable Court to grant them a thirty (30) days extension of time to file their answer to the Counterclaim filed at Docket No. 26.

4. Pursuant to Fed. R. Civ. P 6(b) the extension of time requested herein will start on July 22, 2021 and end on August 21, 2021.

Wherefore, the undersigned respectfully requests from this Honorable Court to authorize the undersigned attorney as counsel for the Grzan-Khimani and to grant their request for extension of time to file their answer to the Counterclaim filed at Docket No. 26.

Respectfully Submitted.

In San Juan, Puerto Rico, this 21st day of July, 2021.

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which will send notice of its filing electronically to the attorneys of record.

Héctor Eduardo Pedrosa Luna, Esq.

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s/Héctor Eduardo Pedrosa Luna

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